

CENTENNIAL COMMUNICATIONS

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May 1, 2003

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Federal Communications Commission
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John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
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**Re: Third Quarterly Report of Centennial Communications Corp.
On Phase II E911 Compliance**

Dear Messer's Solomon and Muleta:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ Centennial Communications Corp. ("Centennial") hereby files its third Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Because Centennial provides CMRS service in two distinct markets, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico, and the second part reports on Phase II E911 deployment in our domestic markets.

I. Puerto Rico

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 - Puerto Rico/US Virgin Islands. Centennial has chosen a network-based solution to deploy Phase II E911 in this MTA. A single PSAP serves Centennial's entire service area in Puerto Rico. To date, Centennial has not yet received a valid request for Phase I or II E911 service from this sole PSAP. However, we continue to be in regular contact with the PSAP, and we are aware that the PSAP has begun the planning and implementation process for both Phase I and Phase II E911 service. In fact, we were recently advised by the Puerto Rico 9-1-1 Governing Board that they hope to have the PSAP operational for Phase I and Phase II service by the end of 2003. Because Centennial attended the first PSAP RFP planning meeting on August 19, 2002, and have remained in regular contact with the 9-1-1

¹ FCC 02-210, released July 26, 2002.

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Governing Board, we believe that we are in a very good position to monitor the PSAP's progress and to coordinate our E911 Phase II implementation process with the PSAP's process.

In addition, Centennial now provides service to the U.S. Virgin Islands of St. Croix and St. Thomas. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

II. Domestic Markets

Through five different subsidiaries,² Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial has chosen a network-based solution offered by Grayson Wireless to deploy Phase II E911 in its domestic markets.³

Phase I Service – As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. As we noted previously, Phase I E911 service has been fully deployed in our Texas markets. In addition, as of March 2003, Phase I E911 service has been fully deployed to all PSAPs in Indiana where Centennial operates. Centennial also notes that, to date, we have not received any valid requests for Phase I (or Phase II) E911 service from PSAPs in the state of Ohio. Presumably, this is due to the fact that Ohio has not yet passed an E911 cost-recovery system for the PSAPs. A chart showing our Phase I E911 implementation progress can be found at Attachment A.

Phase II Service - As Centennial previously has advised the Commission, we are implementing Grayson Wireless' "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets.⁴ Presently, we are still in the pre-deployment engineering stage of the Phase II implementation process for many markets, and in the deployment stage for thirteen markets. As of the date of this report, Centennial still has not yet received any Phase II E911 service requests from PSAPs in Mississippi, Ohio or Texas. A list of all Phase II PSAP requests that we have received thus far, the dates that they were received, and the validity of the Phase II request, can be found at Attachment B. While Centennial did not deploy Phase II service to any of the PSAPs in these twelve markets by the March 1, 2003 deadline, we did negotiate mutually acceptable deployment target dates with each of the PSAPs listed. The main points to be derived from this chart are summarized below.

² Baucé Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

³ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

⁴ *Id.*

In Indiana, we are working with the Indiana Enhanced Wireless 911 Board and its Cost Recovery Group ("Indiana Board") in coordinating Phase II E911 deployment. Thus far, we have received eleven requests from PSAPs for Phase II service that we have determined are valid (along with one request whose validity has not been verified, but which has been scheduled for Phase II deployment nonetheless). These requests came from PSAPs in the following counties - the actual or anticipated deployment date is also noted:

| <u>County</u> | <u>Phase II Deployment Date</u> |
|--|---------------------------------|
| Allen County Sheriff's Dept | May 19, 2003 |
| Blackford County Central Dispatch | July 1, 2003 |
| Carroll County Sheriff's Dept. | July 1, 2003 |
| DeKalb County Police E911 | May 30, 2003 |
| Elkhart County Public Safety Comms Ctr | May 31, 2003 |
| Kokomo Police Department | May 30, 2003 |
| Kosciusko County Sheriff's Office | July 1, 2003 |
| LaGrange County Sheriff's Office | June 15, 2003 |
| Marshall County Sheriff's Office | May 30, 2003 |
| Miami County Sheriff's Office | June 15, 2003 |
| Steuben County Communications | April 30, 2003 |
| Bluffton Police Dept (Wells County) | May 19, 2003 |

As noted above, since the filing of our last quarterly report, we have initiated Phase II service in Steuben County covering 100% of the PSAP's coverage area. For the remaining counties, we have negotiated the mutually acceptable alternative Phase II deployment dates noted. We expect 100% coverage for these PSAP's coverage areas as well. In addition, Centennial continues to work with the PSAPs in Indiana that have not yet perfected their Phase II requests, and to continue to work with the Indiana Board, to develop the most aggressive Phase II deployment schedule possible for these counties.

In Louisiana, we have received Phase II E911 service requests from PSAPs in the following three parishes on the dates noted: Iberia Parish (April 8, 1997), Iberville Parish (January 27, 2000) and Lafayette Parish (December 20, 2000). We have determined that the Lafayette Parish Phase II request is valid, and have been discussing a mutually acceptable alternative Phase II implementation date, although we have not yet reached agreement on that date. The validity of the Phase II requests from the Iberia and Iberville parishes remains unclear. While we have sent a "validity questionnaire" to these PSAPs to clarify their status, we have not heard back from either PSAP. Finally, in Michigan, we have received a single Phase II request from a PSAP in St. Joseph County, and are in contact with the county to determine the validity of this request. At present, we have not received any documentation to verify the validity of the Phase II request. Despite this lack of documentation, however, we continue to press forward with our Phase II deployment plans for St. Joseph County.

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In sum, because Centennial has negotiated mutually acceptable Phase II implementation schedules with each of the PSAPs in its domestic markets that had submitted valid Phase II requests,⁵ Centennial presently is in compliance with all applicable Phase II deployment benchmarks.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, counsel for Centennial, at 202-828-9857.

Sincerely,

/s/ Lourdes L. Lucas

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⁵ See Order on Reconsideration, Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas, FCC 02-318, released November 26, 2002

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ATTACHMENT A

List of PSAPs Receiving Phase I Service

Centennial Communications Corp. – Domestic Markets
Phase I E911 Requests – Implementation Dates

| State | County | PSAP Name | Implementation Date |
|--------------|---------------|--|----------------------------|
| IN | Adams | Adams County Sheriff's Department | 1/10/2001 |
| IN | Allen | Allen County Sheriff's Dept. | 3/31/1998 |
| IN | Allen | Ft. Wayne City Communications | 3/31/1998 |
| IN | Allen | New Haven Police Department | 3/31/1998 |
| IN | Allen | Three Rivers Paramedic | 3/31/1998 |
| IN | Blackford | Blackford County Central Dispatch | 4/14/2000 |
| IN | Carroll | Carroll County Sheriff's Department | 4/21/1999 |
| IN | Cass | Cass County Sheriff's Department | 6/28/2001 |
| IN | Cass | Logansport Police Department | 6/28/2001 |
| IN | Clinton | Clinton County 911 | 5/29/1999 |
| IN | De Kalb | Auburn Police Department | 8/2/2000 |
| IN | De Kalb | DeKalb County Police E911 | 8/2/2000 |
| IN | De Kalb | Garrett Police and Fire Department | 8/2/2000 |
| IN | Elkhart | Elkhart County Public Safety Communications Center | 10/8/1998 |
| IN | Elkhart | Elkhart Police Department | 10/8/1998 |
| IN | Elkhart | Nappanee Police Department | 10/8/1998 |
| IN | Fulton | Rochester Police Department | 12/5/2000 |
| IN | Grant | Grant County Sheriff's Office | 2/22/2000 |
| IN | Grant | Marion Police Department | 2/22/2000 |
| IN | Huntington | Huntington County Sheriff's Office | 3/29/1999 |
| IN | Huntington | Huntington Police Department | 3/29/1999 |
| IN | Jasper | Jasper County Sheriff's Office | 1/23/2001 |
| IN | Jay | Jay County Sheriff's Department | 1/10/2001 |
| IN | Kosciusko | Kosciusko County Sheriff's Office | 5/24/2001 |
| IN | Kosciusko | Warsaw Police Department | 5/24/2001 |
| IN | La Porte | LaPorte County Sheriff's Office | 9/19/2002 |
| IN | Lagrange | Lagrange County Sheriff's Office | 5/21/2001 |
| IN | Marshall | Marshall County Sheriff's Office | 1/24/2001 |
| IN | Miami | Miami County Sheriff's Office | 4/13/1999 |
| IN | Miami | Peru Police Department | 4/13/1999 |
| IN | Noble | Kendalville Police Department | 5/18/2001 |
| IN | Noble | Noble County Sheriff's Office | 5/18/2001 |
| IN | Rush | Rush County Sheriff's Office | 9/26/2002 |
| IN | Rush | Rushville Police Department | 9/26/2002 |
| IN | St Joseph | Mishawaka Fire Department | 2/17/1999 |
| IN | St Joseph | Mishawaka Police Department | 2/17/1999 |
| IN | St Joseph | South Bend Police Department | 2/17/1999 |
| IN | St Joseph | St Joseph County 911 | 2/17/1999 |
| IN | St Joseph | St Joseph County Fire Dispatch | 2/17/1999 |
| IN | Starke | Starke County Sheriff's Office | 5/25/2001 |
| IN | Steuben | Steuben County Communications | 8/4/1998 |
| IN | Wabash | North Manchester Police Department | 6/28/2001 |
| IN | Wabash | Wabash County Sheriff's Office | 6/28/2001 |
| IN | Wabash | Wabash Police Department | 6/28/2001 |
| IN | Wells | Bluffton Police Department | 4/30/1999 |
| IN | Whitley | Columbia City Police Department | 5/18/2001 |

Centennial Communications Corp. – Domestic Markets
Phase I E911 Requests – Implementation Dates

| State | County | PSAP Name | Implementation Date |
|--------------------|---------------|--|----------------------------|
| IN | Whitley | Whitley County Communications Center | 5/18/2001 |
| IN Count | | | 47 |
| LA | Lafayette | Acadian Ambulance Service | 7/27/1999 |
| LA | Lafayette | Lafayette Parish Communications District | 7/27/1999 |
| LA Count | | | 2 |
| MI | Branch | Branch County Central Dispatch | 10/23/2001 |
| MI | Cass | Cass County Sheriff's Department | 10/3/2001 |
| MI | St Joseph | St Joseph County Central Dispatch | 9/28/2001 |
| MI | St Joseph | Sturgis Police Department | 9/28/2001 |
| MI | Van Buren | South Haven Police Department | 10/23/2001 |
| MI | Van Buren | Van Buren County Central Dispatch | 10/23/2001 |
| MI Count | | | 6 |
| TX | Hardin | Hardin County Sheriff's Department | 8/25/2000 |
| TX | Hardin | Silsbee Police Department | 8/25/2000 |
| TX | Jefferson | Beaumont Police Department | 8/25/2000 |
| TX | Jefferson | Jefferson County Sheriff's Department | 8/25/2000 |
| TX | Jefferson | Nederland Police Department | 8/25/2000 |
| TX | Jefferson | Port Arthur Police Department | 8/25/2000 |
| TX | Orange | Bridge City Police Department | 8/25/2000 |
| TX | Orange | Orange County Sheriff's Department | 8/25/2000 |
| TX | Orange | Orange Police Department | 8/25/2000 |
| TX | Orange | Pinehurst Police Department | 8/25/2000 |
| TX | Orange | Vidor Police Department | 8/25/2000 |
| TX Count | | | 11 |
| Grand Count | | | 66 |

ATTACHMENT B

List of Phase II Requests

| State | County | PSAP Name | Valid | Request Date |
|-------|-----------|---|---------|--------------|
| IN | Allen | Allen County Sheriff's Dept. | Yes | 02/02/01 |
| IN | Blackford | Blackford County Central Dispatch | Yes | 08/10/01 |
| IN | Carroll | Carroll County Sheriff's Department | Yes | 08/14/01 |
| IN | Cass | Cass County Sheriff's Department | No | 06/29/01 |
| IN | De Kalb | DeKalb County Police E911 | Unknown | 11/17/00 |
| IN | Elkhart | Elkhart County Public Safety Communications Center | Yes | 01/23/01 |
| IN | Franklin | Franklin County Sheriff's Department | No | 04/13/01 |
| IN | Fulton | Rochester Police Department | No | 05/21/01 |
| IN | Grant | Grant County Sheriff's Office | No | 01/10/01 |
| IN | Howard | Kokomo Police Department | Yes | 11/06/01 |
| IN | Kosciusko | Kosciusko County Sheriff's Office | Yes | 06/20/01 |
| IN | Lagrange | Lagrange County Sheriff's Office | Yes | 11/07/01 |
| IN | Marshall | Marshall County Sheriff's Office | Yes | |
| IN | Miami | Miami County Sheriff's Office | Yes | 04/17/02 |
| IN | Rush | Rush County Sheriff's Office | No | 01/23/01 |
| IN | Steuben | Steuben County Communications | Yes | 10/23/00 |
| IN | Wabash | Wabash County Sheriff's Office | No | 07/02/01 |
| IN | Wayne | Wayne County Sheriff's Department Communications Center | No | 07/16/01 |
| IN | Wells | Bluffton Police Department | Yes | 03/02/02 |
| LA | Iberia | Iberia Parish Sheriff's Office | Unknown | 04/08/97 |
| LA | Iberville | Iberville Parish 911 | Unknown | 01/27/00 |
| LA | Lafayette | Lafayette Parish Communications District | Yes | 12/20/00 |
| MI | St Joseph | St Joseph County Central Dispatch | Unknown | 07/23/02 |